
**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

IVANTI, INC.,

Plaintiff,

v.

STAYLINKED CORP.,

Defendant.

**MEMORANDUM DECISION
AND ORDER**

Case No. 2:19-cv-00075-RJS-JCB

Chief District Judge Robert J. Shelby

Magistrate Judge Jared C. Bennett

Before the court is Ivanti, Inc.’s (“Ivanti”) short form motion for a protective order in which it seeks to maintain a “Confidential—Attorney’s Eyes Only” (“CAEO”) designation for 734 documents that it produced in discovery to Staylinked Corp. (“Staylinked”) based on this court’s Standard Protective Order (“SPO”).¹ On May 28, 2021, Ivanti submitted an Excel spreadsheet in native file format to the undersigned’s chambers after counsel for Staylinked had the opportunity to review it.² On the spreadsheet, Ivanti listed the challenged documents and provided the reasons for its designation of CAEO. Staylinked provided counter-annotations on the spreadsheet opposing Ivanti’s proposed designations. Ivanti also submitted the documents to chambers for an *in camera* review of the CAEO designations.

¹ [ECF No. 69](#).

² [ECF No. 69-2](#).

This court reviewed every document *in camera* and, on July 2, 2021, provided a tentative ruling on each by inserting a note on every line item in the spreadsheet that the parties previously submitted.³ The court’s tentative ruling also ordered simultaneous briefing, which the parties provided.⁴ The court held oral argument on July 27, 2021.⁵ After considering the information provided in the parties’ initial briefing, the court’s *in camera* review, the parties’ supplemental briefing, and oral argument, the court GRANTS IN PART AND DENIES IN PART Ivanti’s motion for protective order. To provide context for the court’s rulings on each document, the court first provides its view of the legal background for protecting documents. Thereafter, the court applies the legal background to the several categories of documents in the materials reviewed *in camera*. Next, the court explains the terms that it uses in the spreadsheet to denote its specific rulings as to each document.⁶ Finally, the court discusses why it declines to award reasonable expenses under Fed. R. Civ. P. 37(a)(5)(C).

LEGAL BACKGROUND

Because this dispute arises over a protective order, the court begins with the rule that governs protective orders: Fed. R. Civ. P. 26(c). Rule 26(c)(1) allows a court “for good cause”

³ [ECF No. 74](#).

⁴ ECF Nos. 81, 82.

⁵ ECF No. 91.

⁶ A .pdf version of the spreadsheet will be attached to this document to memorialize the court’s rulings. However, the explanatory notes for each ruling are only available in the native file format for the spreadsheet, which will be distributed to the parties in a separate email since an Excel spreadsheet cannot be filed on CM/ECF.

to “issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense.”⁷ As an example of this type of information, Rule 26(c)(1) provides that the court can order that “trade secret or other confidential research, development, or commercial information . . . be revealed only in a specified way.”⁸ Courts interpreting this provision under Rule 26 require that “[w]hen a party seeks such a protective order, it ‘must first establish that the information sought is a trade secret [or confidential information] and then demonstrate that its disclosure might be harmful.’”⁹

Based on Rule 26(c) and to make discovery more efficient, this court has adopted the SPO, which applies in every civil case that is filed in this district.¹⁰ The SPO requires disclosure of even confidential information in a “specified way.”¹¹ Parties can designate discovery “Confidential” or Confidential–Attorneys Eyes Only. To be CAEO, the discovery material must be “protected information,” (i.e., confidential or proprietary technical, scientific, financial, business, health, or medical information). Additionally, to warrant a CAEO designation, the “protected information” must be “past, current, or future” that includes five categories: (1) sensitive technical information; (2) sensitive business information; (3) competitive technical information; (4) competitive business information; and (5) “any other protected information the

⁷ Fed. R. Civ. P. 26(c)(1).

⁸ Fed. R. Civ. P. 26(c)(1)(G).

⁹ *In re Cooper Tire & Rubber, Co.*, 568 F.3d 1180, 1190 (10th Cir. 2009) (citation omitted) (alteration added).

¹⁰ DUCivR 26-2(a)(1).

¹¹ Fed. R. Civ. P. 26(c)(1)(G).

disclosure of which to non-qualified people . . . would likely cause harm.”¹² The wording of the fifth category of CAEO information shows that categories (1)-(4) are also linked to Rule 26’s requirement to show “harm” to protect discovery material. Accordingly, based on Rule 26 and the SPO itself, to properly designate discovery material CAEO, the party seeking protection must establish that: (1) the material is “protected information”; (2) material falls into one of the five CAEO categories; and (3) releasing the protected information without the CAEO designation would cause harm to the releasing party.¹³

To determine whether discovery material is the type of protected information warranting protection, courts have considered multiple factors. For example, many courts have followed the Southern District of New York’s approach in *United States v. International Business Machines, Corp.*, 67 F.R.D. 40 (S.D.N.Y. 1975), which considered the following to determine whether a matter in discovery constituted a trade secret:

- (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.¹⁴

¹² SPO, ¶ 2(b) (emphasis added) (capitalization omitted).

¹³ *Id.*

¹⁴ 67 F.R.D. at 47.

Courts use these same factors to determine whether material contains confidential business, commercial, financial, or technical information.¹⁵

But even if the information qualifies as “protected information” in one of the five CAEO categories, the party resisting discovery “must do more than simply allege that the documents are proprietary and confidential.”¹⁶ In addition, the party seeking protection must “set forth specific facts showing good cause, not simply conclusory statements.”¹⁷ “Competitive disadvantage is a type of harm cognizable under rule 26.”¹⁸

CATEGORIAL DETERMINATIONS

Over the course of the court’s *in camera* review, the court came across several recurring issues and offers its opinion on each. First, regarding emails—the bulk of the documents at issue—the court notes the SPO’s requirement that parties must “designate only that part of a document or deposition that is confidential information or confidential information — attorney’s eyes only, rather than the entire document or deposition.”¹⁹ This requirement is significant because the court has found very few email records in which every email in the chain is CAEO.

¹⁵ See, e.g., *S. New England Tel. Co. v. Glob. Naps, Inc.*, No. 04-CV-2075, 2008 WL 11492786, at *3 (D. Conn. June 19, 2008) (relying on six-factor test for determining whether “commercial information” warranted protection under protective order).

¹⁶ *JTS Choice Enters., Inc. v. E.I. Du Pont De Nemours & Co.*, No. 11-CV-03143, 2013 WL 791438, at *2 (D. Colo. Mar. 4, 2013).

¹⁷ *Id.*

¹⁸ *Id.* (quoting *Zenith Radio Corp. v. Matsushita Elec. Indus. Co.*, 529 F. Supp. 866, 890 (E.D. Pa. 1981)).

¹⁹ SPO, ¶ 4(g) (capitalization omitted).

Ivanti has a duty to redact even if the record contains protected information that is CAEO. Withholding the entire document, which may contain parts that are not CAEO, is improper under the SPO. The court is unpersuaded that redacting is “unduly burdensome.” The court itself reviewed all the documents and is aware of how quickly documents can be redacted in Adobe Acrobat. Thus, redacting instead of withholding entire documents is the requirement here, too.

Second, except for Zebra, the court believes that customer names must be redacted before sharing those documents with those other than counsel. Providing customer names to a competitor appears likely to cause Ivanti a competitive disadvantage. This is especially true where, as here, the basis for Staylinked’s requesting these documents was to obtain information about the problems with Ivanti’s product as a defense to Ivanti’s claim that Staylinked was improperly stealing clients from Ivanti. Knowing the specific problems of Ivanti’s product on a specific customer’s system would provide any competitor with a competitive advantage. Redacting customer names should sufficiently alleviate the risk of competitive advantage because knowing the problems with Ivanti’s product without the customer identity makes the prospect of purposefully taking customers unlikely.

Third, as mentioned in the preceding paragraph, many emails contain narrative discussions about problems that Ivanti or its customers were experiencing with certain software applications or hardware. In some emails, there are also actual error logs and code to fix the problems discussed in the emails. The court does not believe that discussions about a customer having problems with the application’s buttons, for example, meets the requirements of “protected information” much less CAEO. In fact, the internet is replete with community fora that discuss troubleshooting of known problems of all sorts of products especially those of an

electronic nature.²⁰ Thus, a general awareness of product problems cannot be CAEO. Also, lists of problems in Ivanti’s resolution queue, repair priority, who was assigned to fix them, or the exchange of pleasantries and jokes between employees, do not appear to the court to meet the definition of “protected information.”

However, the computer-generated error logs, resource reports, kernel traces, and resources traces—although not “code” as that term is used among computer scientists²¹—appear to indicate how Ivanti’s products are running and may provide information as to which system is running them and the specific problems that system is having with Ivanti’s product. This provides a competitive advantage to Staylinked because it would be able to see the specific errors in Ivanti’s system, on specific systems, performing certain functions. That information would be a helpful competitive marketing tool. Consequently, the logs on the spreadsheet marked as “code” will retain their CAEO status.²²

²⁰ For example, those who use Apple products can log on to Apple Support Communities, APPLE, <https://discussions.apple.com/welcome> (last visited Aug. 4, 2021), input the problem that a user is having with their Apple product, and a community of users will provide suggested remedies to the problem. The same type of forum exists for users of any Microsoft product. MICROSOFT, <https://answers.microsoft.com/en-us> (last visited Aug. 4, 2021).

²¹ [ECF No. 85 at 5.](#)

²² The court acknowledges and appreciates the declaration of Bryan S. Morse, who holds a doctorate Ph.D. in Computer Science. Dr. Morse makes a compelling case that the materials marked as “code” do not contain the “secret sauce” of Ivanti’s product in terms of its source code. *Id.* Dr. Morse also helpfully summarizes what the documents marked as “code” on the spreadsheet actually show. *Id.* at 4-8. The things contained in Dr. Morse’s helpful summary undoubtedly reveal how Ivanti’s product operates. *Retail Ventures, Inc. v. Nat’l Union Fire Ins. Co. of Pittsburgh, Pa.*, 691 F.3d 821, 834 (6th Cir. 2012) (stating that information that shows how a business is operated may be treated as protected information). Although Dr. Morse opines that none of this information, with 14 possible exceptions, would “provide StayLinked with any competitive advantage,” [ECF No. 85 at 5](#), the court is unsure the standard that Dr. Morse applied

Fourth, many documents contain charts that also list revenues generated from specific customers. As counsel for Staylinked recognizes, disclosing the revenues to Ivanti's competitor would place Ivanti at a competitive disadvantage. Therefore, these revenues (and customer names) can also be redacted prior to sharing with non-attorneys to avoid placing Ivanti at a competitive disadvantage. After redaction, these documents will not retain their CAEO designation.

Fifth, there are several presentations that appear to have been made to the troubleshooting staff about their efficiency and future workload. Most of these are designated as LANDesk Reports. The court does not see how this generic information is protected or how its disclosure would harm Ivanti by giving Staylinked a competitive advantage. Thus, the CAEO designation on these documents is denied.

Sixth, the documents contain several meeting agendas, which are sometimes called "coreteam notes." These appear to be invitations to a team meeting that also track who was in attendance and the topics that were or may have been discussed. The meeting topics are generally one or two words. At times there is a productivity chart attached. There are also documents that discuss potential training topics for both staff and external customers. These discussions are general and are usually limited to one or two-word topics. The court does not see

to reach that conclusion, especially where, as here, knowing how the product functions and how it errs when performing specific functions would be of benefit to a competitor. Although Staylinked may not review this information, its Technical Advisor certainly can, which still provides Staylinked with the ability to argue that Ivanti's errors caused its customers to go to Staylinked. Therefore, the court is unwilling, at this point, to allow Staylinked to see the materials designated as "code."

how meeting agendas and general training topics constitute protected information much less show competitive harm for their disclosure especially given how old some of these meeting agendas are and how generically the training topics are listed. Therefore, these materials are denied CAEO designation.

Seventh, the documents also contain several employee workplans that set goals and rate progress for a particular employee. Again, the court does not see how generic goals amount to protected information or meet the requirements of CAEO. The court does not understand how disclosure of a generic workplan would place Ivanti at a competitive disadvantage vis-à-vis its competitor. Accordingly, the CAEO status of these documents is denied.

Finally, the documents contain a few manuals that belong to other companies. The court does not see how these manuals that were shared with Ivanti could be considered Ivanti's "protected information." On the other hand, the court does not see how these manuals from other companies could be used in this litigation against Ivanti, but, in any event, they do not appear to meet the requirements for CAEO. Therefore, they are denied CAEO status.

GUIDE TO THE COURT'S SPREADSHEET ANNOTATIONS

Given these general categorical observations, the court provides a key to its document-by-document rulings memorialized on the attached spreadsheet. Where the court denies protection for a document, the column labeled "Court Disposition" will include the word "No." The explanation for that ruling is contained in a note attached to each cell, which is available only in the native file format of Excel, which the parties will receive via separate correspondence. For documents that may contain some CAEO information, the court uses "Partial" and explains that designation in an explanatory note attached to each cell in the native

file format of the Excel spreadsheet. As to a document that the court rules is entirely protected, the court uses the word “Protected.” Where a document shares the same resolution as another version of that same document, the court uses “Same as above” or “Same as [specific number].” For such designations, the parties are directed to the designated cell for the court’s more specific explanation of the court’s ruling on that document.

DECLINATION OF REASONABLE EXPENSES UNDER FED. R. CIV. P. 37

The court declines to impose reasonable expenses for bringing and defending against Ivanti’s Motion for Protective Order because the arguments are substantially justified. Fed. R. Civ. P. 37(a)(5)(C) provides that “[i]f the motion is granted in part and denied in part, the court may, after giving an opportunity to be heard, apportion the reasonable expenses for the motion.” Rule 37(a)(5)(A) and (B) provide the standards as to when fees should not be awarded. Specifically, both state that fees must be awarded unless the arguments of the losing party are “substantially justified.”²³

“Substantially justified” is a familiar term to those who have ever worked with the Equal Access to Justice Act (“EAJA”).²⁴ EAJA allows a “prevailing party” to collect attorney fees against the United States government unless the United States’ litigating position was “substantially justified.”²⁵ The United States Supreme Court held that a position is substantially justified if it is “justified in substance or in the main—that is, justified to a degree that could

²³ Fed. R. Civ. P. 37(a)(5)(A)-(B).

²⁴ 28 U.S.C. § 2412(d)(1)(A).

²⁵ *Id.*

satisfy a reasonable person.”²⁶ Stated differently, a government position is substantially justified “if it has a reasonable basis in both law and fact.”²⁷ Where, as here, Rule 37 employs the same term of art as EAJA for the same purpose of awarding costs and attorney’s fees, the court borrows from EAJA jurisprudence to determine substantial justification.²⁸

After a thorough review of the documents, the court observes that there were a few instances of what the court considers to be over designation of CAEO materials and a few instances in which the designation should not have been challenged because it was clearly warranted. However, any over designation and any misplaced opposition to designation are insufficient to convince the court that the arguments on which the parties relied lacked a reasonable basis in law or fact. Therefore, given the additional discretion entrusted to the court for granting in part and denying in part Ivanti’s motion (i.e., “the court may . . . apportion the reasonable expenses for the motion”),²⁹ the court declines to award reasonable expenses including attorney’s fees.

²⁶ *Pierce v. Underwood*, 487 U.S. 552, 565 (1988).

²⁷ *Hanover Potato Prods., Inc. v. Shalala*, 989 F.2d 123, 128 (3d Cir. 1993).

²⁸ *Lawson v. FMR LLC*, 571 U.S. 429, 459 (2014) (“[P]arallel text and purposes counsel in favor of interpreting . . . provisions consistently.”); *Northcross v. Bd. of Educ. of Memphis City Sch.*, 412 U.S. 427, 428 (1973) (per curiam) (stating that when two provisions of different statutes share similar language, that is a “strong indication” they are to be interpreted consistently); *Morissette v. United States*, 342 U.S. 246, 263 (1952) (explaining that “where Congress borrows terms of art” it also borrows their meaning).

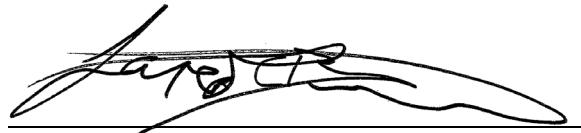
²⁹ Fed. R. Civ. P. 37(a)(5)(C).

ORDER

Based on the foregoing, the court orders Ivanti to produce copies of the documents reviewed *in camera* with redactions as set out above within 60 days of this order.

DATED this 4th day of August 2021.

BY THE COURT:



JARED C. BENNETT
United States Magistrate Judge

BegDoc	EndDoc	Ivanti Reason	Ivanti Subreason	StayLinked Challenge	Year	Court Disposition	Category
IVANTI009594	IVANTI009594	Sensitive Technical Information	Email re Development	Customer name may be redacted	2014	No	Meeting agenda
IVANTI010398	IVANTI010398	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2006	No	Email
IVANTI010995	IVANTI010995	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Customer-facing subject matter, outdated, and not secret	2006	No	Meeting invite
IVANTI011475	IVANTI011495	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011496	IVANTI011543	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011544	IVANTI011592	Sensitive Business Information	Confidential Financial and Marketing Presentation	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011593	IVANTI011600	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011601	IVANTI011608	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011609	IVANTI011616	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011617	IVANTI011663	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011664	IVANTI011714	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2014	No	LAN Desk Report
IVANTI011717	IVANTI011726	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	Public "sales@naurtech.com"	2014	No	Sales presentation
IVANTI011727	IVANTI011736	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	Public "sales@naurtech.com"	2014	No	Sales presentation
IVANTI011737	IVANTI011743	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	Public "sales@naurtech.com"	2014	No	Sales presentation
IVANTI011744	IVANTI011773	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI011774	IVANTI011803	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI011867	IVANTI011897	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI011901	IVANTI011949	Sensitive Business Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012006	IVANTI012015	Sensitive Technical Information	Presentation re Technical Development	Product information re public release	2015	No	LAN Desk Report
IVANTI012016	IVANTI012044	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012130	IVANTI012152	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012154	IVANTI012159	Sensitive Technical Information	Presentation re Technical Development	Product information re public release	2015	No	LAN Desk Report
IVANTI012160	IVANTI012187	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012190	IVANTI012199	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012200	IVANTI012205	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2015	No	LAN Desk Report
IVANTI012302	IVANTI012307	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012358	IVANTI012380	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2016	No	LAN Desk Report
IVANTI012383	IVANTI012384	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012427	IVANTI012428	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012429	IVANTI012431	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	Customer name may be redacted	2016	No	Email
IVANTI012432	IVANTI012434	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012436	IVANTI012436	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012437	IVANTI012437	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked's product information	2016	No	Email
IVANTI012438	IVANTI012463	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2016	No	LAN Desk Report
IVANTI012464	IVANTI012489	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2016	No	LAN Desk Report
IVANTI012497	IVANTI012499	Sensitive Business Information	Confidential Financial and Marketing Information	Sensitive information may be redacted	2016	No	Performance Appraisal
IVANTI012514	IVANTI012516	Sensitive Business Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012517	IVANTI012519	Sensitive Business Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012523	IVANTI012527	Sensitive Technical Information	Code or Log Printout	Sensitive information may be redacted	2016	No	Protected 12523-25 (script) no on rest
IVANTI012565	IVANTI012566	Sensitive Business Information	Confidential Financial and Marketing Information	Sensitive information may be redacted	2016	No	Protected 12523-25 (script) no on rest
IVANTI012570	IVANTI012571	Sensitive Business Information	Confidential Financial and Marketing Information	Sensitive information may be redacted	2016	No	Protected 12523-25 (script) no on rest
IVANTI012572	IVANTI012576	Sensitive Technical Information	Code or Log Printout	Sensitive information may be redacted	2016	No	Protected 12572-74 (script); no on rest
IVANTI012585	IVANTI012591	Sensitive Technical Information	Presentation re Technical Development	Product information re public release	2016	No	LAN Desk Report
IVANTI012601	IVANTI012606	Sensitive Technical Information	Presentation re Technical Development	Outdated and routine report	2016	No	LAN Desk Report
IVANTI012622	IVANTI012624	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012625	IVANTI012628	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012629	IVANTI012632	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012633	IVANTI012636	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012637	IVANTI012640	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012641	IVANTI012645	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012647	IVANTI012649	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer names may be redacted	2016	No	Customer names Protected; rest no
IVANTI012658	IVANTI012665	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012666	IVANTI012673	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012674	IVANTI012681	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012682	IVANTI012689	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012690	IVANTI012693	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012696	IVANTI012704	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012705	IVANTI012708	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012709	IVANTI012717	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012718	IVANTI012725	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012726	IVANTI012734	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012735	IVANTI012743	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012744	IVANTI012746	Sensitive Technical Information	Email re Development	Ivanti public information	2016	No	Protected the script code; rest no
IVANTI012751	IVANTI012760	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012761	IVANTI012770	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012771	IVANTI012781	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012782	IVANTI012792	Sensitive Business Information	Email re Customer License, Sales, or Marketing	Customer-facing subject matter, outdated, and not secret	2016	No	Customer name Protected, rest no
IVANTI012798	IVANTI012802	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email

IVANTI012803	IVANTI012807	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected first email discussing code; rest no for reasons stated above	Email
IVANTI012877	IVANTI012882	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	Protected first email discussing code; no on rest	Email
IVANTI012886	IVANTI012891	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No for reasons in 12798	Email
IVANTI012917	IVANTI012919	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer name may be redacted	2016	Protected first and alst email; rest no	Email
IVANTI012920	IVANTI012942	Sensitive Technical Information	Presentation re Technical Development	Public "Copyright © 2014 Woolworths Limited"	2016	No	Manual
IVANTI012943	IVANTI012944	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI012955	IVANTI012960	Sensitive Technical Information	Presentation re Technical Development	Zebra user guide	2016	No	Manual
IVANTI013117	IVANTI013117	Sensitive Technical Information	Code or Log Printout	"Copyright © 2014 Symbol"	2016	Not sure; is this Ivanti's?	Script
IVANTI013118	IVANTI013120	Sensitive Business Information	Customer License or Contract Information	Zebra End User License Agreement (EULA)	2016	No; Not Ivanti's	License Agreement
IVANTI013121	IVANTI013130	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13124; no on rest	Email
IVANTI013131	IVANTI013140	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13124; no on rest	Email
IVANTI013141	IVANTI013151	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13145; no on rest	Email
IVANTI013152	IVANTI013162	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13156; no on rest	Email
IVANTI013163	IVANTI013165	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013166	IVANTI013169	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013170	IVANTI013180	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13175; no on rest	Email
IVANTI013181	IVANTI013192	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	Protected sample code at 13186; no on rest	Email
IVANTI013194	IVANTI013197	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013202	IVANTI013202	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013211	IVANTI013212	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013213	IVANTI013216	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013217	IVANTI013219	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013226	IVANTI013227	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013228	IVANTI013229	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013230	IVANTI013233	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013234	IVANTI013235	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013236	IVANTI013237	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013238	IVANTI013247	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2016	No; same as above;	Email
IVANTI013248	IVANTI013250	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013251	IVANTI013255	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013256	IVANTI013256	Sensitive Business Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013258	IVANTI013261	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; where is the code?	Email
IVANTI013262	IVANTI013265	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same email series as above	Email
IVANTI013266	IVANTI013267	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; what code?	Email
IVANTI013269	IVANTI013271	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same string as above	Email
IVANTI013272	IVANTI013274	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same string as above	Email
IVANTI013275	IVANTI013277	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same string as above	Email
IVANTI013279	IVANTI013281	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same string as above	Email
IVANTI013282	IVANTI013284	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013285	IVANTI013287	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; describes problem not code	Email
IVANTI013288	IVANTI013290	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013291	IVANTI013293	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013294	IVANTI013301	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013308	IVANTI013309	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013310	IVANTI013311	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013312	IVANTI013313	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013314	IVANTI013315	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No; same as above	Email
IVANTI013316	IVANTI013319	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email
IVANTI013328	IVANTI013330	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2016	No	Email

IVANTI044509	IVANTI044513	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	Public domain information	2017		
IVANTI044514	IVANTI044518	Competitive Technical Information	Technical Analysis or Comparison of Competitor Products	StayLinked public information	2017	Same as above	Email
IVANTI044535	IVANTI044537	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044538	IVANTI044540	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	No	Email
IVANTI044541	IVANTI044544	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Same as above	Email
IVANTI044545	IVANTI044547	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Same as above	Email
IVANTI044548	IVANTI044551	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044552	IVANTI044555	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044556	IVANTI044560	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044561	IVANTI044567	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Protected	Email
IVANTI044568	IVANTI044571	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044572	IVANTI044575	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044576	IVANTI044579	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044580	IVANTI044587	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044588	IVANTI044596	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044597	IVANTI044605	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044606	IVANTI044614	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Partial	Email
IVANTI044615	IVANTI044623	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Same as above	Email
IVANTI044624	IVANTI044633	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Same as above	Email
IVANTI044634	IVANTI044643	Sensitive Business Information	Email re Highly Sensitive Financial or Marketing Information	Primarily public information	2017	Same as above	Email
IVANTI044651	IVANTI044657	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	No	Email
IVANTI044665	IVANTI044668	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044702	IVANTI044706	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044707	IVANTI044711	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044713	IVANTI044717	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044719	IVANTI044748	Sensitive Technical Information	Presentation re Technical Development	Public "Welcome everyone! And thank you for joining us for this Ivanti session."	2017	No	Client Presentation
IVANTI044749	IVANTI044760	Sensitive Technical Information	Presentation re Technical Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Client Presentation
IVANTI044761	IVANTI044765	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	No	Email
IVANTI044766	IVANTI044770	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044771	IVANTI044775	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044776	IVANTI044780	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI044781	IVANTI044785	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2017	Same as above	Email
IVANTI045349	IVANTI045384	Sensitive Technical Information	Code or Log Printout	Public "Copyright © 2017 Daniel Eden"	2018	Protected	Code
IVANTI045626	IVANTI045635	Sensitive Technical Information	Presentation re Technical Development	Customer-facing subject matter, outdated, and not secret	2018	No	Presentation
IVANTI046698	IVANTI046698	Sensitive Technical Information	Email re Code Fix/Change for Customers	Customer-facing subject matter, outdated, and not secret	2018	Partial	Email
IVANTI046699	IVANTI046701	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2018	Partial	Email
IVANTI046702	IVANTI047168	Sensitive Technical Information	Code or Log Printout	Customer-facing subject matter, outdated, and not secret	2018	Protected	Code
IVANTI047530	IVANTI047530	Sensitive Technical Information	Email re Development	Customer-facing subject matter, outdated, and not secret	2019	No	Meeting agenda
IVANTI048412	IVANTI048888	Sensitive Business Information	Customer Pricing Data	Public "For more information on our products: www.honeywellaidc.com"	2020	No	Customer manual
IVANTI048889	IVANTI048890	Sensitive Business Information	Customer Pricing Data	Public "©2020 Honeywell International, Inc."	2020	Same as above	Customer policy
IVANTI049019	IVANTI049019	Sensitive Business Information	Customer Pricing Data	Customer-facing subject matter, outdated, and not secret	2020	Partial	Email
IVANTI049020	IVANTI049489	Sensitive Business Information	Customer Pricing Data	Public "For more information on our products: www.honeywellaidc.com"	2020	Same as 48412	Customer manual
IVANTI049490	IVANTI049491	Sensitive Business Information	Customer Pricing Data	Public "©2020 Honeywell International, Inc."	2020	Same as 48889	Customer policy
IVANTI049524	IVANTI050013	Sensitive Business Information	Customer Pricing Data	Public "For more information on our products: www.honeywellaidc.com"	2021	Same as 48412	Customer manual
IVANTI050058	IVANTI050521	Sensitive Business Information	Customer Pricing Data	Public "For more information on our products: www.honeywellaidc.com"	2021	Same as 48412	Customer manual
IVANTI050522	IVANTI050522	Sensitive Business Information	Financial and Marketing Spreadsheet	Public "For more information on our products: www.honeywellaidc.com"	2021	No	Spreadsheet
IVANTI053517	IVANTI053933	Sensitive Business Information	Customer Pricing Data	Public "For more information on our products: www.honeywellaidc.com"	2021	Same as 48412	Customer manual
IVANTI053934	IVANTI053934	Sensitive Business Information	Financial and Marketing Spreadsheet	Public "For more information on our products: www.honeywellaidc.com"	2021	Same as 50522	Spreadsheet